UNITED	STATES	DISTRI	ICT C	OURT
EASTER	N DISTR	ICT OF	NEW	YORK

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YAROSLAV SURIS, on behalf of himself and all others similarly situated,

MOTION FOR DEFAULT JUDGMENT

Plaintiff(s), Case No.: 1:20-cv-06096-RRM-JRC

-against-

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Defendant(s).
UP INC.,

Plaintiff YAROSLAV SURIS hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of Plaintiff and against Defendant(s) COLLIVE CORPORATION and COLLIVE MEDIA GROUP INC., on the grounds that said Defendant(s) failed to answer or otherwise defend against the Complaint.

Dated: Manhasset, New York June 22, 2021

Respectfully submitted,

/s/ Mitchell Segal

Mitchell Segal, Esq. Law Offices of Mitchell S. Segal, P.C. Attorney For Plaintiff 1129 Northern Boulevard, Suite 404 Manhasset, New York 11030

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TO:

COLLIVE CORPORATION c/o Department of State One Commerce Plaza 99 Washington Avenue Albany, New York 12231 COLLIVE CORPORATION 1650 Eastern Parkway, Suite 406 Brooklyn, New York 11233

COLLIVE MEDIA GROUP INC. c/o Department of State One Commerce Plaza 99 Washington Avenue Albany, New York 12231

COLLIVE MEDIA GROUP INC. 1217 President Street Brooklyn, New York 11225